

EXHIBIT A-1



Dilip Jana <janadilip@gmail.com>

Case 4:24-cv-00698-SDJ-BD: Request for Stipulation for Unopposed Motion to Compel and In Camera Review (EXHIBITS 1 and 2, Dkt. 13)

1 message

Dilip Jana <janadilip@gmail.com>

Tue, Jul 8, 2025 at 9:43 AM

To: peter.wahby@gtlaw.com, morgan.jones@gtlaw.com, Holmes.Hampton@gtlaw.com

Cc: Dilip Jana <janadilip@gmail.com>

Dear Counsel,

Plaintiff intends to file a Motion to Compel and for In Camera Review regarding EXHIBIT 1 and EXHIBIT 2 of the Complaint (Dkt. 13) in connection with your responses to Plaintiff's Interrogatories Nos. 1-4.

In the interest of "efficient" discovery (see Dkt. 51, Walmart's Motion for Protective Order) and consistent with your representations to the Court in Dkt. 65:

"To the extent the Court deems it necessary to evaluate the confidentiality of any of the documents currently at issue before entering a protective order, Walmart respectfully requests that the Court conduct an in camera review of the documents,"

Please let me know if you will stipulate this as an unopposed motion.

If I do not receive a response by **July 9, 2025, at 5:00 PM Central**, I will assume you are opposed, contradicting your prior representations to the Court regarding the need for in camera review, and will note this in the filing.

Thank you for your attention, and I look forward to your prompt response.

Kind regards,

Dr. Dilip Jana

800 Fairlawn St, Allen, TX, 75002

Ph: 318-243-9743

EMail: janadilip@gmail.com